

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

The Financial Oversight and The Management Board  
for Puerto Rico

as representative of

THE COMMONWEALTH OF PUERTO RICO, et. al.

Debtors.

PROMESA

Title III

No. 17-003283

**REPLY IN OPPOSITION TO DEBTOR'S SIXTY-FOURTH OMNIBUS OBJECTION  
(SUBSTANTIVE) TO CLAIMS BASED ON MUTUAL-FUND INVESTMENTS**

**TO THE HONORABLE COURT:**

**BY COUNSEL COMES**, creditor Helvia S. Caparros Santos, and respectfully states and prays as follows:

1. The appearing party filed a Proof of Claim in these proceedings on or about May 21, 2018.
2. On or about July 26, 2019, the Commonwealth of Puerto Rico, by and through the Financial Oversight and Management Board for Puerto Rico, filed its Sixty-Fourth Omnibus Objection (Substantive) to Claims Based on Mutual-Fund Investments ("the 64<sup>th</sup> Omnibus Objection"). See docket entry 8297.
3. This Omnibus Objection included an objection to the appearing party's Proof of Claim.
4. On August 28, 2019, at docket entry 8563, creditor Noreen Wiscovitch Rentas filed a Response in Opposition to Debtor's 64<sup>th</sup> Omnibus Objection.
5. On August 29, 2019, creditor Alberto J. Aristizabal Ocampo, likewise filed a Reply in Opposition to the Debtor's 64<sup>th</sup> Omnibus Objection at docket 8572.

6. The appearing creditor joins, adopts and incorporates herein by reference, the responses filed by creditors Wiscovitch and Aristizabal in opposition to the referenced Omnibus Objection.

7. The appearing creditor hereby joins the arguments and reasoning set-forth by creditors Wiscovitch and Aristizabal in their respective responses at dockets 8563 and 8572. Moreover, the appearing creditor specifically requests the Court to Order the debtor to provide evidence that her claims have been asserted and properly defended by the appropriate mutual fund in these proceedings.

WHEREFORE, the appearing creditor respectfully request to this Honorable Court to take note of the foregoing and, as a result, to deny the Debtor's Sixty-Fourth Omnibus Objection as it relates to her Proof of Claim.

RESPECTFULLY SUBMITTED,

In San Juan, today the 4<sup>th</sup> day of September 2019.

I hereby certify that on this date the foregoing was filed electronically with the Clerk of the Court using the CM/ECF system which will send notification of said filing to all CM/ECF participants.

By: s/ Patrick D. O'Neill  
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